

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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TZVI WEISS, <i>et. al.</i> ,	:	
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Plaintiffs,	:	CV 05-4622 (CPS) (KAM)
	:	
-against-	:	
	:	
	:	ANSWER AND
	:	<u>AFFIRMATIVE DEFENSES</u>
NATIONAL WESTMINSTER BANK, PLC,	:	
	:	
Defendant.	:	
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Defendant National Westminster Bank Plc (“NatWest”) by its counsel, Cleary Gottlieb Steen & Hamilton LLP, as and for its Answer and Affirmative Defenses to the Fifth Amended Complaint (the “Complaint”), states as follows:

NATURE OF ACTION

1. Denies the allegations contained in paragraph 1 of the Complaint to the extent they involve matters of fact relating to NatWest, denies knowledge or information sufficient to form a belief as to the truth of such allegations as they pertain to other persons, and states that the balance of paragraph 1 consists of conclusions of law to which no responsive pleading is necessary, except admits that NatWest is a financial institution headquartered in the United Kingdom.

JURISDICTION AND VENUE

2. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 2 of the Complaint, except admits that plaintiffs purport to base jurisdiction on the statutory provisions cited therein.

3. States that paragraph 3 of the Complaint consists of a legal conclusion as to which no responsive pleading is necessary.

4. Denies the allegations contained in paragraph 4 of the Complaint.

THE PARTIES

5. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 5 of the Complaint.

6. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 6 of the Complaint.

7. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 7 of the Complaint to the extent they refer to matters of fact, and states that the balance of paragraph 7 consists of conclusions of law to which no responsive pleading is necessary.

8. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 8 of the Complaint.

9. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 9 of the Complaint.

10. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 10 of the Complaint.

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272. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 272 of the Complaint.

273. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 273 of the Complaint.

274. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 274 of the Complaint.

275. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 275 of the Complaint.

276. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 276 of the Complaint.

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278. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 278 of the Complaint.

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287. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 287 of the Complaint.

288. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 288 of the Complaint.

289. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 289 of the Complaint.

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297. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 297 of the Complaint.

298. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 298 of the Complaint.

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300. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 300 of the Complaint.

301. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 301 of the Complaint.

302. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 302 of the Complaint.

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411. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 411 of the Complaint.

412. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 412 of the Complaint.

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414. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 414 of the Complaint.

415. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 415 of the Complaint.

416. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 416 of the Complaint.

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418. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 418 of the Complaint.

419. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 419 of the Complaint.

420. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 420 of the Complaint.

421. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 421 of the Complaint.

422. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 422 of the Complaint.

423. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 423 of the Complaint.

424. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 424 of the Complaint.

425. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 425 of the Complaint.

426. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 426 of the Complaint.

427. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 427 of the Complaint.

428. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 428 of the Complaint.

429. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 429 of the Complaint.

430. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 430 of the Complaint.

431. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 431 of the Complaint.

432. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 432 of the Complaint.

433. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 433 of the Complaint.

434. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 434 of the Complaint.

435. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 435 of the Complaint.

436. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 436 of the Complaint.

437. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 437 of the Complaint.

438. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 438 of the Complaint.

439. Denies the allegations contained in paragraph 439 of the Complaint, except admits that NatWest is a British financial institution with its principal place of business in London, United Kingdom, and avers that NatWest is a wholly-owned subsidiary of the Royal Bank of Scotland Group.

440. Denies the allegations contained in paragraph 440 of the Complaint.

441. Denies the allegations contained in paragraph 441 of the Complaint, except admits that NatWest was registered to conduct business within the State of Texas, avers that NatWest closed its Texas office on September 15, 2003, and refers the Court to the Texas state records for a true and accurate statement of their contents.

FACTUAL ALLEGATIONS

442. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 442 of the Complaint.

443. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 443 of the Complaint.

444. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 444 of the Complaint.

445. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 445 of the Complaint.

446. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 446 of the Complaint.

447. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 447 of the Complaint.

448. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 448 of the Complaint.

449. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 449 of the Complaint.

450. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 450 of the Complaint, to the extent they refer to matters of fact, and states that the balance of paragraph 450 consists of conclusions of law to which no responsive pleading is necessary.

451. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 451 of the Complaint.

452. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 452 of the Complaint.

453. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 453 of the Complaint.

454. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 454 of the Complaint.

455. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 455 of the Complaint.

456. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 456 of the Complaint.

457. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 457 of the Complaint.

458. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 458 of the Complaint.

459. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 459 of the Complaint.

460. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 460 of the Complaint.

461. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 461 of the Complaint, to the extent they refer to matters of fact, and states that the balance of paragraph 461 consists of conclusions of law to which no responsive pleading is necessary.

462. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 462 of the Complaint, except denies that Interpal maintains several accounts at NatWest.

463. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 463 of the Complaint.

464. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 464 of the Complaint.

465. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 465 of the Complaint.

466. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 466 of the Complaint, except admits, upon information and belief, that the U.S. government designated Interpal a Specially Designated Global Terrorist (“SDGT”) on or around August 22, 2003.

467. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 467 of the Complaint, except admits, upon information and belief, that the U.S. government designated Interpal an SDGT on or around August 22, 2003.

468. Denies the allegations contained in paragraph 468 of the Complaint.

469. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 469 of the Complaint.

470. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 470 of the Complaint.

471. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 471 of the Complaint.

472. Denies the allegations contained in paragraph 472 of the Complaint concerning knowledge by NatWest of Yussuf al-Qaradawi's connections to terrorism and Interpal, and denies having knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

473. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 473 of the Complaint.

474. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 474 of the Complaint.

475. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 475 of the Complaint.

476. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 476 of the Complaint.

477. Denies the allegations contained in paragraph 477 of the Complaint to the extent they pertain to NatWest, and denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations in paragraph 477.

478. Denies the allegations contained in paragraph 478 of the Complaint to the extent they pertain to NatWest, and denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 478.

479. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 479 of the Complaint.

480. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 480 of the Complaint.

481. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 481 of the Complaint.

482. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 482 of the Complaint.

483. Denies the allegations contained in paragraph 483 of the Complaint to the extent they pertain to NatWest, and denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 483.

484. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 484 of the Complaint.

485. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 485 of the Complaint.

486. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 486 of the Complaint.

487. Denies the allegations contained in paragraph 487 of the Complaint.

488. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 488 of the Complaint.

489. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 489 of the Complaint.

490. Admits the allegations contained in paragraph 490 of the Complaint.

491. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 491 of the Complaint, except admits that Interpal had accounts at NatWest in 1996, avers that the U.K. Charity Commission froze Interpal's accounts at NatWest in March 1996, but ultimately released Interpal's assets from that freeze in April

1996, and refers to the Charities Act 1993 for a true and accurate description of the Commission's powers and functions.

492. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 492 of the Complaint.

493. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 493 of the Complaint, except admits that Interpal had accounts at NatWest in 1996, and avers that the U.K. Charity Commission froze Interpal's accounts at NatWest in March 1996, but ultimately released Interpal's assets from that freeze in April 1996.

494. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 494 of the Complaint, except admits that Interpal had accounts at NatWest in 1996, avers that the U.K. Charity Commission froze Interpal's accounts at NatWest in March 1996, but ultimately released Interpal's assets from that freeze in April 1996, and refers to the Charity Commission's May 30, 1996 report for a true and accurate statement of the Commission's findings.

495. In response to paragraph 495 of the Complaint, refers to the Charity Commission's May 30, 1996 report for a true and accurate statement of its contents.

496. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 496 of the Complaint, and refers to the Charity Commission's May 30, 1996 report for a true and accurate statement of its contents.

497. States that paragraph 497 of the Complaint consists of conclusions of law to which no responsive pleading is necessary.

498. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 498 of the Complaint to the extent they involve matters of fact, and states that the balance of paragraph 498 consists of conclusions of law to which no responsive pleading is necessary.

499. Denies the allegations contained in paragraph 499 of the Complaint to the extent they involve matters of fact that pertain to NatWest, denies knowledge or information sufficient to form a belief as to such allegations as they pertain to any other person, and states that to the extent paragraph 499 involves conclusions of law, no responsive pleading is necessary.

500. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 500 of the Complaint, except admits that Interpal had accounts at NatWest, and avers that the U.K. Charity Commission froze Interpal's accounts at NatWest in March 1996, but ultimately released Interpal's assets from that freeze in April 1996.

501. Denies the allegations contained in paragraph 501 of the Complaint.

502. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 502 of the Complaint.

503. Denies the allegations contained in paragraph 503 of the Complaint.

504. Denies the allegations contained in paragraph 504 of the Complaint to the extent they pertain to NatWest, and denies knowledge or information sufficient to form a belief as to the truth of such allegations as they pertain to any other person.

505. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 505 of the Complaint.

506. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 506 of the Complaint.

507. Denies the allegations contained in paragraph 507 of the Complaint, except admits that on August 16, 2002, and pursuant to instructions received from Interpal, NatWest effected the transfer of \$1,906.00 from an account owned by Interpal to the Orphan Care Society.

508. Denies the allegations contained in paragraph 508 of the Complaint, except admits that on September 17, 2002, and pursuant to instructions received from Interpal, NatWest effected the transfer of £6,547.00 from an account owned by Interpal to the Orphan Care Society.

509. Denies the allegations contained in paragraph 509 of the Complaint, except admits that on November 15, 2002, and pursuant to instructions received from Interpal, NatWest effected the transfer of £5,707.00 from an account owned by Interpal to the Orphan Care Society.

510. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 510 of the Complaint.

511. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 511 of the Complaint.

512. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 512 of the Complaint.

513. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 513 of the Complaint.

514. Denies the allegations contained in paragraph 514 of the Complaint, except admits that on May 2, 2003, and pursuant to instructions received from Interpal, NatWest effected the transfer of £15,713.00 from an account owned by Interpal to the Jenin Zakat Committee.

515. Denies the allegations contained in paragraph 515 of the Complaint, except admits that on July 11, 2003, and pursuant to instructions received from Interpal, NatWest effected the transfer of £15,330.00 from an account owned by Interpal to the Jenin Zakat Committee.

516. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 516 of the Complaint.

517. States that paragraph 517 of the Complaint purports to reference organizations listed in paragraph 352 of the Complaint, but as no list of organizations appears in paragraph 352, no responsive pleading is necessary.

518. Denies the allegations contained in paragraph 518 of the Complaint.

519. Denies the allegations contained in paragraph 519 of the Complaint, and denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in the footnote thereto, except admits that on April 12, 2000, and pursuant to instructions received from Interpal, NatWest accepted payments totaling \$66,000.00 from “Holyland Foundation General.”

520. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 520 of the Complaint.

521. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 521 of the Complaint to the extent they involve matters of fact, and states that to the extent they consist of conclusions of law, no responsive pleading is necessary.

522. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 522 of the Complaint.

523. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 523 of the Complaint to the extent they involve matters of fact, except admits, upon information and belief, that the Council of the European Union designated the Holy Land Foundation as a terrorist organization in December 2001, and states that to the extent these allegations consist of conclusions of law, no responsive pleading is necessary.

524. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 524 of the Complaint to the extent they involve matters of fact, except admits, upon information and belief, that HAMAS and the Holy Land Foundation were named on the European Union's list of entities subject to financial sanctions, and states that to the extent these allegations consist of conclusions of law, no responsive pleading is necessary.

525. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 525 of the Complaint.

526. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 526 of the Complaint to the extent they involve matters of fact, and states that to the extent they consist of conclusions of law, no responsive pleading is necessary.

527. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 527 of the Complaint to the extent they involve matters of fact, and states that to the extent they consist of conclusions of law, no responsive pleading is necessary.

528. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 528 of the Complaint.

529. Denies the allegations contained in paragraph 529 of the Complaint, except admits that on March 27, 2003, and pursuant to instructions received from Interpal, NatWest accepted payments totaling 295,000 Euros from Stichting Al-Aqsa, and denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in the footnote thereto.

530. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 530 of the Complaint to the extent they involve matters of fact, and states that to the extent they consist of conclusions of law, no responsive pleading is necessary.

531. Denies the allegations contained in paragraph 531 of the Complaint.

532. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 532 of the Complaint.

533. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 533 of the Complaint.

534. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 534 of the Complaint.

535. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 535 of the Complaint.

536. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 536 of the Complaint.

537. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 537 of the Complaint.

538. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 538 of the Complaint to the extent they refer to matters of fact, except admits, upon information and belief, that the U.S. government designated Interpal an SDGT on or around August 22, 2003, and states that the balance of paragraph 538 consists of conclusions of law to which no responsive pleading is necessary.

539. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 539 of the Complaint.

540. Denies the allegations contained in paragraph 540 of the Complaint.

541. Denies the allegations contained in paragraph 541 of the Complaint as they pertain to NatWest, and denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

542. Denies the allegations contained in paragraph 542 of the Complaint.

543. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 543 of the Complaint.

544. Denies the allegations contained in paragraph 544 of the Complaint.

545. Denies the allegations contained in paragraph 545 of the Complaint and avers that at various times, Interpal had accounts numbered 140-00-04156838, 60720508524882 and 60082295142940 at NatWest.

546. Denies the allegations contained in paragraph 546 of the Complaint.

547. Denies the allegations contained in paragraph 547 of the Complaint.

548. Denies the allegations contained in paragraph 548 of the Complaint.

549. Denies the allegations contained in paragraph 549 of the Complaint.

550. Denies the allegations contained in paragraph 550 of the Complaint.

551. Denies the allegations contained in paragraph 551 of the Complaint.

552. Denies the allegations contained in paragraph 552 of the Complaint relating to the transfer by Interpal, except admits that on February 19, 2003, and pursuant to instructions received from Interpal, NatWest effected the transfer of £21,424.00 from an account owned by Interpal to the Tulkarem Zakat Committee, and denies knowledge or information sufficient to form a belief as to the truth of the balance of allegations contained in paragraph 552 of the Complaint, including the authenticity of Exhibit A.

553. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 553 of the Complaint, to the extent they refer to matters of fact, and states that the balance of paragraph 553 consists of conclusions of law to which no responsive pleading is necessary.

554. Denies the allegations contained in paragraph 554 of the Complaint, except admits that on April 1, 2003, and pursuant to instructions received from Interpal, NatWest effected the transfer of £18,000.00 from an account owned by Interpal to the Tulkarem Zakat Committee.

555. Denies the allegations contained in paragraph 555 of the Complaint relating to the transfer by Interpal, except admits that on July 30, 2003, and pursuant to instructions received from Interpal, NatWest effected the transfer of £73,757.00 from Interpal's account numbered 60082295142940 to the Jenin Zakat Committee, and denies knowledge or information sufficient to form a belief as to the truth of the balance of allegations contained in paragraph 555 of the Complaint, including the authenticity of Exhibit B.

556. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 556 of the Complaint.

557. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 557 of the Complaint, to the extent they refer to matters of fact, and states that the balance of paragraph 557 consists of conclusions of law to which no responsive pleading is necessary.

558. Denies the allegations contained in paragraph 558 of the Complaint.

559. Denies the allegations contained in paragraph 559 of the Complaint relating to the transfer by Interpal, except admits that on November 5, 2003, and pursuant to instructions received from Interpal, NatWest effected the transfer of £32,329.00 from Interpal's account numbered 60082295142940 to the Jenin Zakat Committee, and denies knowledge or information sufficient to form a belief as to the truth of the balance of allegations contained in paragraph 559 of the Complaint, including the authenticity of Exhibit C.

560. States that paragraph 560 of the Complaint, which is a sentence fragment, consists of conclusions of law to which no responsive pleading is necessary.

561. States that paragraph 561 of the Complaint, which is a sentence fragment, consists of conclusions of law to which no responsive pleading is necessary.

562. Denies that the Financial Action Task Force defines and enforces legal norms, and states that the balance of paragraph 562 of the Complaint consists of conclusions of law to which no responsive pleading is necessary.

563. Upon information and belief, admits the allegations contained in paragraph 563 of the Complaint.

564. States that paragraph 564 of the Complaint consists of conclusions of law to which no responsive pleading is necessary.

565. States that paragraph 565 of the Complaint consists of conclusions of law to which no responsive pleading is necessary.

566. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 566 of the Complaint.

567. States that paragraph 567 of the Complaint consists of conclusions of law to which no responsive pleading is necessary.

568. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 568 of the Complaint, except, upon information and belief, admits that the FATF issued a report in April 2002, and refers to that report for a true and accurate statement of its contents.

569. To the extent that paragraph 569 of the Complaint quotes from the FATF report, refers to such report for a true and accurate statement of its contents, and states that paragraph 569 otherwise consists of conclusions of law to which no responsive pleading is necessary.

570. States that paragraph 570 of the Complaint consists of conclusions of law to which no responsive pleading is necessary.

571. Denies the allegations contained in paragraph 571 of the Complaint.

572. Denies the allegations contained in paragraph 572 of the Complaint, and refers to the July 16, 2002 press release by six U.K. banks, including Royal Bank of Scotland, for a true and accurate statement of its contents.

573. Denies the allegations contained in paragraph 573, avers that six U.K. banks, including Royal Bank of Scotland, issued a "Statement of Principles" on July 16, 2002, and refers to such Statement for a true and accurate statement of its contents.

574. Denies the allegations contained in paragraph 574 to the extent they purport to involve matters of fact, and states that to the extent paragraph 574 of the Complaint consists of conclusions of law, no responsive pleading is necessary.

575. States that paragraph 575 of the Complaint consists of conclusions of law to which no responsive pleading is necessary.

576. States that paragraph 576 of the Complaint consists of conclusions of law to which no responsive pleading is necessary.

577. Denies the allegations contained in paragraph 577 of the Complaint as they pertain to NatWest, and denies knowledge or information sufficient to form a belief as to the truth of the remaining allegations.

578. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 578 of the Complaint.

FIRST CLAIM FOR RELIEF

579.-586. In response to paragraphs 579-586 of the Complaint, states that this claim has been dismissed, and that no responsive pleading to it is therefore required.

SECOND CLAIM FOR RELIEF

587. In response to paragraph 587 of the Complaint, reports and realleges paragraphs 1 through 586 hereof as if fully set forth herein.

588. Denies the allegations contained in paragraph 588 of the Complaint.

589. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 589 of the Complaint.

590. Denies the allegations contained in paragraph 590 of the Complaint.

591. Denies the allegations contained in paragraph 591 of the Complaint.

592. Denies the allegations contained in paragraph 592 of the Complaint.

593. Denies the allegations contained in paragraph 593 of the Complaint.

THIRD CLAIM FOR RELIEF

594. In response to paragraph 594 of the Complaint, reports and realleges paragraphs 1 through 593 hereof as if fully set forth herein.

595. Denies the allegations contained in paragraph 595 of the Complaint.

596. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 596 of the Complaint.

597. Denies the allegations contained in paragraph 597 of the Complaint.

AFFIRMATIVE DEFENSES

First Affirmative Defense

598. The Complaint fails to state a claim upon which relief can be granted.

Second Affirmative Defense

599. Plaintiffs' claims are barred, in whole or in part, by the intervening acts, wrongs, omissions and/or negligence of other individuals or entities.

Third Affirmative Defense

600. Plaintiffs' claims are barred, in whole or in part, by plaintiffs' lack of standing to raise these claims.

Fourth Affirmative Defense

601. To the extent that plaintiffs have suffered damages, any such damages were not caused by any conduct of NatWest, but resulted in whole or in part from the conduct of plaintiffs and/or persons other than NatWest.

Fifth Affirmative Defense

602. There is no legal basis for Plaintiffs' requested relief of a declaratory order.

Sixth Affirmative Defense


603. To the extent that plaintiffs have already recovered or will from other persons for the injuries alleged by them, they are barred from seeking duplicative recovery from NatWest.

Additional Affirmative Defenses

604. NatWest hereby gives notice that it intends to rely upon any other defense or defenses that may become available or appear during pretrial proceedings in this case and hereby reserves the right to amend this Answer and Affirmative Defenses to the Fifth Amended Complaint to plead and assert any such additional affirmative defenses as they become known and appropriate during the course of litigation.

Dated: New York, New York
February 11, 2008

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